

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

HO WAN KWOK,
a/k/a “Miles Guo,”
a/k/a “Miles Kwok,”
a/k/a “Guo Wengui,”
a/k/a “Brother Seven,”
a/k/a “The Principal,”
a/k/a “Boss,” and

YANPING WANG,
a/k/a “Yvette,”
a/k/a “Y,”

Defendants.

[Proposed] Pretrial Scheduling Order

S2 23 Cr. 118 (AT)

WHEREAS trial in this matter is set to begin on May 20, 2024;

The Court ORDERS as follows:

1. **Expert Notice:** The parties shall exchange expert notices, except for translation and experts that rebut the opposing party’s previously notified expert, on or before **April 1, 2024**.¹
2. **Notice of Certain Defenses:** The defendants shall notify the Government of their intention, if any, to rely on an advice-of-counsel, reliance on counsel, presence of counsel, or other involvement of counsel as a defense to the charges, if any, by **April 20, 2024**. Such notice shall identify the attorney(s) relied upon, the specific advice provided, and any discovery supporting such a defense that the defendants intend to rely on at trial.

¹ The parties shall work in good faith to reach an agreement regarding language translations.

3. **Rule 16 Discovery Materials:** The Government shall complete production of Rule 16 discovery in its possession by **April 10, 2024**. The defendants shall complete production of Rule 16 discovery in their possession by **April 22, 2024**. Rule 16 materials acquired after those dates shall be produced on a rolling basis.

4. **Government Trial Exhibits:** The Government shall provide defendants' counsel exhibits that the Government reasonably expects to seek to introduce during its case-in-chief by **April 30, 2024**. These exhibits will be subject to good-faith revisions as the Government continues to prepare its case for trial, including in response to the defendants' list of intended exhibits and witnesses.

5. **Government § 3500 Material and Witness List:** The Government shall provide the defendants' counsel § 3500 material, and its witness list by **May 6, 2024**. Section 3500 material generated after that date shall be provided to defendants' counsel on a rolling basis. The witness list will be subject to good-faith revisions including in response to the defendants' list of intended exhibits and witnesses.

6. **Defendants' Trial Exhibits:** The defendants shall provide the Government the exhibits that the defendants reasonably expect to seek to introduce during their case-in-chief by **May 10, 2024**. These exhibits will be subject to limited good-faith revisions as the defense continues to prepare its case for trial.

7. **Defense Witness List:** The defendants shall provide their lists of witnesses whom the defendants reasonably expect to call in their case-in-chief by **May 10, 2024**. The witness list will be subject to limited good-faith revisions.

8. **Defense 26.2 Material:** The defendants shall provide Rule 26.2 materials for their witnesses by **May 13, 2024**. Rule 26.2 material generated after that date shall be provided to the Government on a rolling basis.

9. **Protection of Victims from Harassment:** The Government may produce § 3500 material and exhibits that would reveal the identity of any victims as “Attorney’s Eyes Only” pursuant to the Protective Order (Dkt. 51). No later than four days before a victim whose § 3500 material is marked “Attorney’s Eyes Only” testifies, the Government shall designate such material “Highly Confidential.” No later than four days before an exhibit that is marked “Attorney’s Eyes Only” is offered for admission at trial, the Government shall designate such an exhibit as “Highly Confidential.”

SO ORDERED:

Dated: New York, New York
April __, 2024

THE HON. ANALISA TORRES
UNITED STATES DISTRICT JUDGE